

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

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ANITA COLEMAN, individually,  
and as Special Administrator of the  
ESTATE OF TRENTON WHITE

Plaintiffs,

Case No.: 2:18-cv-01098-PP

MHS HEALTH WISCONSIN

Involuntary Plaintiffs,

v.

MILWAUKEE BOARD OF SCHOOL DIRECTORS,  
CALVIN RAYFORD,  
MAURICE TURNER, and  
RYAN SCHMIDT

Defendants.

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**DECLARATION OF DREW DEVINNEY**

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I, Drew DeVinney, being first duly sworn, swear and state as follows:

1. Attached as Exhibit 1 is a true and correct copy of the deposition transcript of the testimony of defendant Maurice Turner, taken August 16, 2019.
2. Attached as Exhibit 2 is a true and correct copy of the deposition transcript of the testimony of defendant Calvin Rayford, taken July 16, 2019.
3. Attached as Exhibit 3 is a true and correct copy of the Statements of Calvin Rayford and Ryan D. Schmidt, Claim P 346-0055781-01

4. The defendants produced the audio of a recorded statement of Calvin Rayford obtained by Liberty Mutual Insurance Company on October 12, 2015 at approximately 3:23 pm. The following are true and correct excerpts of the statements made by Calvin Rayford:

(a) “I’ve actually seen him done it before. He’s actually pretty good. We’ve got a couple kids that are pretty good at it and he is one of them. Again, the first two he did was flawless, very flawless. The third one, I don’t know, it seems like to me that maybe he was trying to do like a twist in the air.”

(b) “Right when the bell rung, a guy named Alazatheta (sp?) did a flip in the gym and that’s what triggered Trent to say, ‘Okay well maybe I can do one too.’ Coming in I’ve seen a lot of kids you know, if you can do a flip and you see another kid do one it’s more than likely that he’s gonna get up and do it too. That’s not the first time I’ve seen that happen either.”

5. Attached as Exhibit 4 is a true and correct copy of the deposition transcript of the testimony of defendant Ryan Schmidt, taken October 22, 2019.

I declare stated under penalty of perjury that the foregoing is true and correct.

Executed on February 17, 2020

/s/ Drew J. DeVinney  
Drew J. DeVinney